

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN  
CRYAN, AND CHRISTIAN SEWING,

Defendants.

**Case No. 1:22-cv-02854-JSR**

**NOTICE OF MOTION AND MOTION FOR AN AWARD  
OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,  
AND COMPENSATORY AWARDS TO PLAINTIFFS**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 102), on January 31, 2023 at 9:00 a.m., before the Honorable Jed S. Rakoff in Courtroom 14-B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, or by telephonic, video conferencing or other electronic means, as posted on the website of the Claims Administrator, Lead Counsel Pomerantz LLP, on behalf of all Plaintiffs' Counsel, will and hereby do move the Court for entry of an Order awarding attorneys' fees in the amount of 33 1/3% of the Settlement Fund (or \$8,750,000, plus interest earned at the same rate as the Settlement Fund) and reimbursement of Litigation Expenses in the amount of \$688,352.41, as well as \$20,000 for each of the Lead Plaintiff and Named Plaintiff, as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).<sup>1</sup>

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Emma Gilmore in Support of: (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court. Defendants take no position on this motion.

Dated: December 27, 2022

**POMERANTZ LLP**

/s/ Emma Gilmore

Jeremy A. Lieberman

Emma Gilmore

Dolgora Dorzhieva

Villi Shteyn

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<sup>1</sup> Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement, dated September 23, 2022. *See* ECF No. 101-1.

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*Lead Counsel for Lead Plaintiff Yun Wang,  
Named Plaintiff Ali Karimi, and  
the Settlement Class*

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*Additional Counsel for Plaintiffs and for the  
Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: December 27, 2022

/s/ Emma Gilmore  
Emma Gilmore